

UNITED STATES BANKRUPTCY
COURT

FOR THE EASTERN DISTRICT OF
VIRGINIA - RICHMOND DIVISION ①

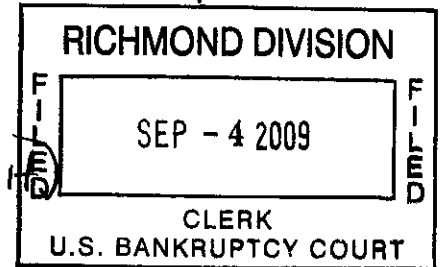
Re: CM # 13340

FRANKLIN WILSON VS CIRCUIT CITY

Re: CIRCUIT CITY STORES INC.

CASE NO. 08-35653 (KRW)

DEBTOR



Re: THIRTY-FIRST OMNIBUS OBJECTION
CLAIMS # ("THE OBJECTION")

Re: ORDER ESTABLISHING OMNIBUS
OBJECTION PROCEDURES AND APPROVING
THE FORM AND MANNER OF THE NOTICE
OF OMNIBUS OBJECTIONS (DOCKET NO. 2881)
EXHIBIT 1

DEBTOR: CIRCUIT CITY STORES
BY THE OMNIBUS OBJECTION, THE
DEBTORS SEEKING TO DISALLOW
AND/OR MODIFY THE CLAIM CASE NO
13340 - FRANKLIN WILSON
2 HIGHLAND STREET
PORT CHESTER, NY. 10573

UNITED STATES BANKRUPTCY
COURT
FOR THE EASTERN DISTRICT OF
VIRGINIA RICHMOND DIVISION

②

Re: (THE "RESPONSE") FROM FRANKLIN S. WILSON

Re: PURSUANT TO RULE 3007-1 OF THE
LOCAL RULES OF THE UNITED STATES
BANKRUPTCY COURT FOR THE EASTERN
DISTRICT OF VIRGINIA AND THE OMNIBUS
OBJECTION PROCEDURES, - A WRITTEN
RESPONSE AND A REQUEST FOR A HEARING
ARE NOW FILED BY FRANKLIN WILSON
AND FILED WITH THE CLERK OF THE
COURT AND SERVED ON THE OBJECTING
PARTY - GREGORY CITY STORES - KYATZMAN
CARSON CONSULTANTS

AS WELL AS ASKING THE COURT
TO THROW OUT THIS FRIVOLOUS
SECOND OWNERS OBJECTION BY
KYATZMAN CARSON FOR GREGORY
CITY STORES INC. AND CONSEQUENTLY
BRINGING US TO RAISING THE AMOUNT
OF MY CLAIM TO \$20,000,000

UNITED STATES BANKRUPTCY COURT
FOR THE

EASTERN DISTRICT OF
VIRGINIA RICHMOND DIVISION

(3)

b. AN EXPLANATION FOR THE AMOUNT OF
THE CLAIM

1) THREE OF THE WORLD'S MOST VALUABLE
PAINTINGS BY VINCENT VAN GOGH AND
REGISTERED IN MY NAME WITH THE
ART LOSS REGISTER - NEW YORK CITY
PHOTOGRAPHED AND FILED FOR EBAY
AUCTION ON THE, NOW DESTROYED BY
CIRCUIT CITY, WEBSITE TWENTY
CENTENNIAL@EBAY.COM

a.) "SELF PORTRAIT WITH BANDAGE EAR
AND PIPE" - VINCENT

MINIMUM BID \$85,000,000.

b.) "THE PLANE" (SECOND STARRY NIGHT) - VINCENT

MINIMUM BID - \$100,000,000.

c.) "SELF PORTRAIT, WITH THE ARTIST ON
THE ROAD TO TARASCON" - VINCENT

MINIMUM BID - \$75,000,000

2.) BOUGHT DIAMOND AUCTION LOTS
TOTAL SIXTY-FIVE LOTS - APPROX 1500
CARATS EACH LOT.

UNITED STATES DISTRICT COURT
FOR THE
EASTERN DISTRICT OF
VIRGINIA - RICHMOND DIVISION

(4)

3) LONG ISLAND SOUND PETROLEUM
DISCOVERY AND GRANT - ANNOUNCEMENT
TO THE NATION - BY FRANKLIN S. WILSON
FILED WITH SECRETARY OF STATE
STATE OF N.Y. -

FRANKLIN S. WILSON -
(VAN BOGHT ACT) FSW LTD - PETROLEUM DIAMOND, GOLD
EIN - 13-4171316 Tel. 1-845-326-70

4) ALL OF MY EFFORTS TO REACH THE
NATION AND ESTABLISH MY OIL WERE
WERE DESTROYED BY CIRCUIT CITY -
BY REASON MY COMPANY WAS MY ONLY
AND FIRST COMPUTER, I AM NOT A
COMPUTER TECHNICIAN AND COULD NOT
REPAIR IT TO PUT MY GOODS BACK
ON E BAY AND THE INTERNET

5) FOR SECURITY AND MY OWN
SAFETY I WORK ALONE IN
SECRET.

6) MICROSOFT IS MY TESTIFYING
WITNESS - CAPTURED ON CD

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT
OF VIRGINIA RICHMOND DIVISION ⑤

THAT THIS DESTRUCTION TO MY COMPANY
AND MY CAREERS AND LIFE BY
CIRCUIT CITY WAS NOT ACCIDENTAL
BUT WAS, AS STATED BY AND INVESTIGATED
BY MICROSOFT FOR ME ON REQUEST,
"MALICIOUS AND INTENTIONAL"
SOFTWARE AND HARDWARE TAP PERIOD
"INTENTIONAL HUMAN MISUSE"
CRIMINAL TAP PERIOD NOT WORTHY
OF ANY OMNIBUS OBJECTION - BUT TO
PAY THE FULL PRICE OF WHAT I ESTIMATE
TO BE THE COST AND DAMAGE TO ME:
NOTWITHSTANDING SHORTCIRCUITING
MY ATTEMPTS TO FULFILL MY DUTY
TO THIS NATION - ABANDONING WITH
MY LONG-ISLAND OIL AND PETROLEUM
FIELDS - TO EASE THE STRAIN ON
U.S. AT THE PUMP.

UNITED STATES BANKRUPTCY COURT
FOR THE

EASTERN DISTRICT OF

VIRGINIA - RICHMOND DIVISION

6

AND FINALLY YOUR HONOR, IT HAS
ALREADY BEEN DETERMINED BY
BANKRUPTCY COURT THAT THIS CASE
CLAIM #13340 IS NOT ELIGIBLE TO BE
DISALLOWED OR MODIFIED BY OMNIBUS
OBJECTION AS SCHAEWELCH REQUESTED
OF THE COURT BY MY ADVERSARY
KURTZMAN CARSON CONSULTANTS FOR
CIRCLET CITY STORES, ATTEMPTING
TO "PULL THE WOOL OVER MY EYES"
DOUBLE JEOPARDY, CONTEMPT OF COURT
BY KURTZMAN CARSON. THIS CASE DOES
NOT COME UNDER THATY - FIRST OMNIBUS
OBJECTION TO CLAIMS. NOT ELIGIBLE
BY TIME OF THE FILING AND,
THIS IS A CRIMINAL CLAIM AS WELL
AND NOT ... OF CERTAIN LEGAL CLAIMS
SUCH AS CIVIL FOR PROPERTY NOT
DELIVERED BY CIRCLET CITY BUT PAID
FOR BY A CLAIMANT. BY REASON OF THIS
FRAUDULENT ATTEMPT BY MY OPPONENT THE
CLAIM SHOULD BE DOUBLED TO \$20,000,000.

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT
OF VIRGINIA - RICHMOND DIVISION

"RESPONSE":

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NO, YOUR HONOR, I DO NOT CONCEDE TO HURTZMAN CARSON CONSULTANTS SCHAFFER AND FRAUDULENT ATTEMPT TO GET ME TO AUTHORIZE THE DISALLOWANCE OF MY OWN CLAIM. THIS TYPE OF CONSCIENCELESS AND DISGUSTING ATTEMPT DISQUALIFYS THEM FROM ANY SETTLEMENT OR MODIFICATION WITH ME: I DO NOT HONOR OR REWARD DECEIT AND DECEPTION. THEY MUST BE PENALIZED NOT REWARDED, NOT CONSIDERED. AS WELL THE CRIMINAL ACT OF MALICIOUS INTENT BY CIRCUIT CITY HAS LEFT THEM NO MARGIN FOR MODIFICATION OF THE AMOUNT OF MY CLAIM. ATTEMPTING, AND FRAUDULENTLY, TO BRING THIS CLAIM UNDER, TO DEFINE IT AS "... CERTAIN LEGAL CLAIMS, CERTAIN MINOR LEGAL CLAIMS" IS CONTEMPT OF COURT, LIEING TO THE COURT, BY HURTZMAN CARSON FOR CIRCUIT CITY AND THEY MUST BE PENALIZED FOR DOING THIS BY THE COURT. DECEPTION IT IS.

AUG 31, 2009

Signed: Franklin S. [illegible]

Gregg M. Galardi, Esq.
Ian S. Fredericks, Esq.
SKADDEN, ARPS, SLATE, MEAGHER &
FLOM, LLP
One Rodney Square
PO Box 636
Wilmington, Delaware 19899-0636
(302) 651-3000

Dion W. Hayes (VSB No. 34304)
Douglas M. Foley (VSB No. 34364)
MCGUIREWOODS LLP
One James Center
901 E. Cary Street
Richmond, Virginia 23219
(804) 775-1000

- and -

Chris L. Dickerson, Esq.
SKADDEN, ARPS, SLATE, MEAGHER &
FLOM, LLP
155 North Wacker Drive
Chicago, Illinois 60606
(312) 407-0700

Counsel to the Debtors and
Debtors in Possession

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

- - - - - x
In re: : Chapter 11
:
CIRCUIT CITY STORES, INC., : Case No. 08-35653 (KRH)
et al., :
:
Debtors. : Jointly Administered
- - - - - x

**NOTICE OF DEBTORS' THIRTY-FIRST OMNIBUS OBJECTION
TO CLAIMS (DISALLOWANCE OF CERTAIN LEGAL CLAIMS)**

PLEASE TAKE NOTICE THAT the above-captioned Debtors (the "Debtors") filed the Debtors' Thirty-First Omnibus Objection to Claims (Disallowance of Certain Legal Claims) (the "Objection") with the Bankruptcy Court. A copy of the Objection is attached to this notice (this "Notice") as Exhibit 1. By the Omnibus Objection, the Debtors are seeking to disallow certain claims.

PLEASE TAKE FURTHER NOTICE THAT on April 1, 2009, the Bankruptcy Court entered the Order Establishing Omnibus Objection Procedures and Approving the Form and Manner of the Notice of Omnibus Objections (Docket No. 2881) (the

"Order"), by which the Bankruptcy Court approved procedures for filing omnibus objections to proofs of claim and requests for allowance and payment of administrative expenses and/or cure claims (collectively, the "Claims") in connection with the above-captioned chapter 11 cases (the "Omnibus Objection Procedures").

Specifically, the Objection seeks to disallow and/or modify certain claims, including your claim(s), listed below, all as set forth in the Objection.

<u>TO</u>	<u>Claim Number</u>	<u>Amount Claimed as Filed</u>
Franklin Spencer Wilson 2 Highland St Port Chester, NY 10513	13340	\$10,000,000.00

YOU ARE RECEIVING THIS NOTICE BECAUSE THE PROOF(S) OF CLAIM LISTED HEREIN THAT YOU FILED AGAINST ONE OR MORE OF THE DEBTORS IN THE ABOVE-CAPTIONED CHAPTER 11 CASES ARE SUBJECT TO THE OBJECTION. YOUR RIGHTS MAY BE AFFECTED BY THE OBJECTION. THEREFORE, YOU SHOULD READ THIS NOTICE (INCLUDING THE OBJECTION AND OTHER ATTACHMENTS) CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY. IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.

MOREOVER, PURSUANT TO RULE 3007-1 OF THE LOCAL RULES OF THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA AND THE OMNIBUS OBJECTION PROCEDURES, UNLESS A WRITTEN RESPONSE AND A REQUEST FOR A HEARING ARE FILED WITH THE CLERK OF THE COURT AND SERVED ON THE OBJECTING PARTY BY 4:00 P.M. (EASTERN) ON SEPTEMBER 15, 2009, THE COURT MAY DEEM ANY OPPOSITION WAIVED, TREAT THE OBJECTION AS CONCEDED AND ENTER AN ORDER GRANTING THE RELIEF REQUESTED WITHOUT A HEARING.

Critical Information for Claimants
Choosing to File a Response to the Objection

Who Needs to File a Response: If you oppose the relief requested in the Objection and if you are unable to resolve the Objection with the Debtors before the deadline to respond, then you must file and serve a written response (the "Response") to the Objection in accordance with this Notice.

If you do not oppose the relief requested in the Objection, then you do not need to file a written Response to the Objection and you do not need to appear at the hearing.

Response Deadline: The Response Deadline is **4:00 p.m. (Eastern Time) on September 15, 2009 (the "Response Deadline")**.

THE BANKRUPTCY COURT WILL ONLY CONSIDER YOUR RESPONSE IF YOUR RESPONSE IS FILED, SERVED AND RECEIVED BY THE RESPONSE DEADLINE.

Your Response will be deemed timely filed only if the Response is **actually received** on or before the Response Deadline by the Bankruptcy Court at the following address:

Clerk of the Bankruptcy Court
United States Bankruptcy Court
701 East Broad Street - Room 4000
Richmond, Virginia 23219

Your Response will be deemed timely served only if a copy of the Response is actually received on or before the Response Deadline by the Debtors' attorneys:

SKADDEN, ARPS, SLATE, MEAGHER MCGUIREWOODS LLP
& FLOM, LLP One James Center
One Rodney Square 901 E. Cary Street
PO Box 636 Richmond, VA 23219
Wilmington, DE 19899-0636 Attn: Dion W. Hayes
Attn: Gregg M. Galardi Attn: Douglas M. Foley
Attn: Ian S. Fredericks

- and -

SKADDEN, ARPS, SLATE, MEAGHER
& FLOM, LLP
155 North Wacker Drive
Chicago, Illinois 60606
Attn: Chris L. Dickerson

The status hearing on the Objection will be held at
11:00 a.m. (Eastern) on September 22, 2009 at:

United States Bankruptcy Court
701 East Broad Street - Courtroom 5100
Richmond, Virginia 23219

If you file a timely Response, in accordance with the
Objection Procedures, you do not need to appear at the
status hearing on the Objection.

**Procedures for Filing a Timely Response and
Information Regarding the Hearing on the Objection**

Contents. To facilitate a speedy and non-judicial
resolution of a Claim object to the Objection, any
filing a Response shall use its best efforts to include
following (at a minimum) in its filed Response, to the
extent such materials are not attached to its proof
claim:

- ✓ a. a caption setting forth the name of
Bankruptcy Court, the name of the Debtor
the case number and the title of the
Objection which the Response is C

SKADDEN, ARPS, SLATE, MEAGHER & FLOM, LLP One Rodney Square PO Box 636 Wilmington, DE 19899-0636 Attn: Gregg M. Galardi Attn: Ian S. Fredericks	MCGUIREWOODS LLP One James Center 901 E. Cary Street Richmond, VA 23219 Attn: Dion W. Hayes Attn: Douglas M. Foley
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status hearing on the Objection.

**Procedures for Filing a Timely Response and
Information Regarding the Hearing on the Objection**

Contents. To facilitate a speedy and non-judicial
resolution of a Claim subject to the Objection, any claimant
filing a Response shall use its best efforts to include the
following (at a minimum) in its filed Response, to the
extent such materials are not attached to its proof of
claim:

- ✓ a. a caption setting forth the name of the
Bankruptcy Court, the name of the Debtors,
the case number and the title of the
Objection to which the Response is directed;

- b. the claimant's name and an explanation for the amount of the Claim;
- c. a concise statement, executed by (or identifying by name, address and telephone number) a person with personal knowledge of the relevant facts that support the Response, setting forth the reasons why the Bankruptcy Court should overrule the Objection as to the claimant's claim, including, without limitation (to the extent not set forth in its proof of claim), the specific factual and legal bases upon which the claimant intends to rely in support of its Response and its underlying Claim;
- d. a copy of or identification of any other documentation or other evidence of the Claim, to the extent not already included with the Claim that the claimant presently intends to introduce into evidence in support of its Claim at the hearing; provided, however, that for a Response filed in support of a Claim arising out of a lease of real property, the Response need not attach such lease if the claimant indicates its willingness to provide such documentation upon request;
- e. a declaration of a person with personal knowledge of the relevant facts that support the Response; and
- f. the claimant's address, telephone number and facsimile number and/or the name, address, telephone number and facsimile number of the claimant's attorney and/or designated representative to whom the attorneys for the Debtors should serve a reply to the Response, if any (collectively, the "Notice Address"). If a Response contains Notice Address that is different from the name and/or address listed on the Claim, the Notice Address will control and will become the service address for future service of papers with respect to all of the claimant's Claims listed in the Objection (including all Claims to be

disallowed) and only for those Claims in the Objection.

- g. To the extent such person differs from the person identified pursuant to subsection e, above, the name, address, telephone number, facsimile number, and electronic mail address of the representative of the claimant (which representative may be the claimant's counsel) party with authority to reconcile, settle or otherwise resolve the Objection on the claimant's behalf (collectively, the "Additional Addresses"). Unless the Additional Addresses are the same as the Notice Addresses, the Additional Address will not become the service address for future service of papers.

Additional Information. To facilitate a resolution of the Objection, your Response should also include the name, address, telephone number and facsimile number of the party with authority to reconcile, settle or otherwise resolve the Objection on the claimant's behalf. Unless the Additional Addresses are the same as the Notice Addresses, the Additional Addresses will not become the service address for future service of papers.

Failure to File Your Timely Response. If you fail to file and serve your Response on or before the Response Deadline in compliance with the procedures set forth in this Notice, the Debtors will present to the Bankruptcy Court an appropriate order granting the relief requested in the Objection without further notice to you.

Each Objection Is a Contested Matter. Each Claim subject to the Objection and the Response thereto shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014, and any order entered by the Bankruptcy Court will be deemed a separate order with respect to such claim.

Additional Information

Requests for Information. You may also obtain a copy of the Objection or related documents on the internet, by

accessing the website of the Debtors at
www.kccllc.net/circuitcity.

Reservation of Rights. Nothing in this Notice or the Objection constitutes a waiver of the Debtors' right to assert any claims, counterclaims, rights of offset or recoupment, preference actions, fraudulent-transfer actions or any other claims against you by the Debtors. Unless the Bankruptcy Court allows your Claims or specifically orders otherwise, the Debtors have the right to object on any grounds to the Claims (or to any other Claims or causes of action you may have filed or that have been scheduled by the Debtors) at a later date on any grounds or bases. In such event, you will receive a separate notice of any such objections.

Dated: August 20, 2009
Richmond, Virginia

SKADDEN, ARPS, SLATE, MEAGHER &
FLOM, LLP
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Ian S. Fredericks, Esq.
P.O. Box 636
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- and -

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/s/ Douglas M. Foley
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One James Center
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Richmond, Virginia 23219
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Counsel for Debtors and Debtors
in Possession

9789328.1

Dated: August 20, 2009
Richmond, Virginia

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Richmond, Virginia 23219
(804) 775-1000

Counsel for Debtors and Debtors
in Possession

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SVC: 2
PACK No: 106
OMNI 31

CASE No: 08-35653
PRF No. 18538

FRANKLIN SPENCER WILSON
2 HIGHLAND ST
PORT CHESTER, NY 10513